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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

Case No. 3:23-md-03084-CRB

Honorable Judge Charles R. Breyer

**DECLARATION OF WILLIAM A.
LEVIN IN SUPPORT OF
ADMINISTRATIVE MOTION TO FILE
PARTIALLY UNDER SEAL THE
OPPOSITION TO THE APPLICATION
FOR CO-LEAD COUNSEL OF RACHEL
ABRAMS**

This Document Relates to:

ALL ACTIONS

I, William A. Levin, declare as follows:

1. I am an attorney duly licensed to practice law before all courts of the State of California. I am a Founding Partner at the law firm Levin Simes LLP, and counsel of record for all Jane Doe LSA and Jane Doe LS Plaintiffs in 89 actions tagged into this MDL. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

2. This declaration is made in support of Levin Simes Plaintiffs' Administrative Motion to

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File Partially Under Seal the Opposition to The Application For Co-Lead Counsel Of Rachel Abrams.

3. The attached letter includes confidential and sensitive information regarding Rachel Abrams. This information is the subject of a private arbitration between Levin Simes and Peiffer Wolf and Rachel Abrams, pending before the Hon. Rebecca Westerfield (Ret.). The trial of that suit is set for April 15, 2024.

4. The portions of the document that are redacted include statements made by a plaintiff in this MDL, information regarding settlement negotiations, and other sensitive information regarding Ms. Abrams.

5. The context of the redacted portions are such that they do not bear on any issue other than Mr. Abrams' appointment as co-lead, and are only relevant to her application to the Court.

6. In an effort to avoid bringing this confidential and sensitive information to Your Honor's attention, Levin Simes made a good faith effort to inform Ms. Abrams, Peiffer Wolf, the other co-lead Plaintiff's Leadership Group ("PLG") applicants, as well as some of the other counsel included in the PLG, of our concerns regarding her application for the co-lead position. However, our efforts were unsuccessful.

7. Given our duty to protect our clients' interest in who is being entrusted and appointed to lead their litigation, we felt we had no other option than to privately inform the court.

8. As a consequence, due to the confidential and sensitive nature of the redacted portions, we believe it would be best to be viewed only by those who are necessary to resolve this issue --Your Honor, Ms. Abrams, and opposing counsel. However, if Rachel Abrams chooses to share this with other fellow PLG applicants, we would have no objection.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 22, 2023, in San Francisco, California.

/s/ William A. Levin

William A. Levin
Attorney for Doe LS Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ William A. Levin
William A. Levin

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